

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

**DEEP MARINE HOLDINGS, INC.,
et. al.**

Debtors.

CASE NO. 09-39313
(Jointly Administered)

CHAPTER 11

DEEP MARINE 1, LLC

Plaintiff,

**ADVERSARY NO. 10-03271
(DIAMOND)**

THE DEEP MARINE LIQUIDATING TRUST (AS SUCCESSOR TO DEEP MARINE TECHNOLOGY INCORPORATED, DEEP MARINE HOLDINGS, INC., DEEP MARINE 1, LLC; DEEP MARINE 2, LLC, DEEP MARINE 3, LLC, AND DEEP MARINE 4, LLC); GENERAL ELECTRIC CAPITAL CORPORATION; NOBLE DENTON MARINE, INC.; BNA MARINE SERVICES, LLC; OTTO CANDIES, LLC; B&J MARTIN, INC.; NREC POWER SYSTEMS, INC.; CAPROCK COMMUNICATIONS, INC.; BOLLINGER SHIPYARDS TEXAS CITY, LP; BOLLINGER FOURCHON, LLC; ARAMARK US OFFSHORE SERVICES, LLC; AND CROSSMAR, INC.

Defendants.

RULE 26(A)(1) INITIAL DISCLOSURES BY CAPROCK COMMUNICATIONS, LLC

CAPROCK COMMUNICATIONS, INC. a Defendant in the above styled adversary proceeding, provides the following disclosures pursuant to Fed. R. Civ. P. 26(a)(1) based on the information reasonably available to it as of the date of these disclosures.

1. Persons Likely to Have Discoverable Information. The following persons are likely to have discoverable information that the Defendant may use to support its claims and defenses in this adversary proceeding:

Name, Address & Tel. No. (if known)	Area of Knowledge
Carole Clause, Accounting Manager Caprock Communications c/o Hoover Slovacek 5847 San Felipe, Suite 2200 Houston, Texas 77057 Tel: (713) 977-8686	Ms. Clause has knowledge regarding the services provided by Caprock to Debtors, when the services were provided, and the amounts owed for the services provided.
The Employees of Deep Marine Technology Incorporated and Deep Marine Holdings, Inc. c/o Liquidating Trustee Grant Thorton, LLP 1717 Main Street, Suite 1500 Dallas, Texas 75201	Mr. Bittner is the Liquidating Trustee and former Chief Restructuring Officer of the Debtors. Mr. Bittner is believed likely to have discoverable information concerning any claims or defenses asserted by the Trust.

2. Relevant Documents. Caprock believes that most of the responsive documents, including the applicable invoices for services provided, are now in the actual or constructive possession of The Deep Marine Liquidating Trust. All other responsive documents are available for inspection and copying at Hoover Slovacek, LLP, 5847 San Felipe, Suite 2200, Houston, Texas 77057, at a mutually convenient time during normal business working hours.

3. Computation of Damages. Caprock seeks approval of an allowed unsecured claim in the amount of \$278,505.47 in the Deep Marine Technology Incorporated, case no. 09-39314.

4. Insurance. Caprock is not aware of any applicable insurance agreements.

5. Experts.

Non-Retained Experts.

Carole Clause, Accounting Manager · Accounts Receivable
Caprock Communications, Inc.
c/o Hoover Slovacek, LLP
5847 San Felipe, Suite 2200
Houston, Texas 77057
(713) 977-8686

While not formally retained as a testifying expert, Caprock designates each the foregoing person, together with any persons previously identified and to be identified as persons with knowledge of relevant facts, as persons with applicable education, knowledge, training, experience, skill and expertise, qualifying them as testifying experts to the extent that their factual testimony on issues relating to the subject matters of this suit is found to constitute proper expert testimony. As such, the foregoing person, while having factual knowledge, may testify in such a way that her testimony may be characterized as expert and/or opinion testimony, therefore, and only to that extent, each is designated as both and expert and fact witness in this case.

Each of the foregoing is likely to testify about all or a portion of the following subject matters: the issues involved in the suit; the contract and/or scope of work involved in the suit; the operation, management, and procedures as they relate to the contract made subject of this suit; Caprock's industry and business standards and practices; and all other matters as they may relate to the equipment and services provided and/or their area of expertise.

Each of the individual's expertise and material reviewed can be inquired into during any deposition, but will include, without limitation, the material produced in the case, the depositions taken in the case, and all other matters as may be reasonable or customary to review by them or related to the project in this case. They may also offer rebuttal evidence to the testimony of others, the substance of which cannot be anticipated at this time. In addition, they may testify as to all other matters concerning the allegations against as may relate to their areas of expertise.

The basis for her mental impressions and opinions, to the extent they are determined to be such, can be inquired into during their depositions, but briefly, they may include but may not be limited to, her education, background, training and years of experience in the communications industry; their review of documents produced in this case; Caprock's industry and business standards and practices, discussions with employees/principals of Deep Marine Technology, the payment received by Caprock for the equipment and services provided, and/or such other materials as they may select.

Respectfully submitted,

HOOVER SLOVACEK LLP

/s/ T. Josh Judd

By: _____

EDWARD L. ROTHBERG

State Bar No. 17313990

ANNIE E. CATMULL

State Bar No. 00794932

T. JOSH JUDD

State Bar No. 24036866

5847 San Felipe, Suite 2200

Houston, Texas 77057

Telephone: 713.977.8686

Facsimile: 713.977.5395

**ATTORNEYS FOR DEFENDANT,
CAPROCK COMMUNICATIONS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the persons identified below on November 5, 2010, via electronic delivery through the Court's electronic docketing system or by separate email.

/s/ T. Josh Judd

T. Josh Judd

Susan C. Mathews

Susan.Mathews@arlaw.com

Counsel for GE

Jason Cohen

jason.cohen@bgllp.com;

Counsel for the Liquidating Trustee

Jeff Goebel

jeff.goebel@nobledenton.com;

Counsel for Noble Denton Marine, Inc.

David W. Barry

bankruptcy@barryandsewart.com;

Counsel for BNA Marine Services, LLC

Thomas S. Henderson, III

thenderson@tsh-atty.com;

Counsel for Otto Candies, LLC

David Carrigee

DCarrigee@bhbmlaw.com

Counsel for Otto Candies, LLC

Stephen Lynn Williamson

swilliamson@monbar.com;

Counsel for Bollinger Shipyards Texas City, LP

Andrew T. Lilly

alilly@monbar.com;

Counsel for Bollinger Fourchon, LLC

Ryan Matthew McCabe

rmccabe@monbar.com;

Counsel for Bollinger Fourchon, LLC

Stephen Lynn Williamson
swilliamson@monbar.com;
Counsel for Bollinger Fourchon, LLC

Angela Sheffler Abreu
aabreu@mccarter.com;
Counsel for Aramark U.S. Offshore Services, LLC

Ayse M. Aruch
AAruch@McCarter.com;
Counsel for Aramark U.S. Offshore Services, LLC

Andrew T. Lilly
alilly@monbar.com;
Counsel for Crossmar, Inc.

Ryan Matthew McCabe
rmccabe@monbar.com;
Counsel for Crossmar, Inc.

Stephen Lynn Williamson
swilliamson@monbar.com;
Counsel for Crossmar, Inc.

Alexander@cajunnet.net;

Jacques P. DeGruy
jdegruy@mblb.com;
Counsel for B&J Martin, Inc.